

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

**CHARITY CHIDINMA
EMERONYE SWIFT,**

Plaintiff,

v.

**FRONTIER AIRLINES, INC.
(a Colorado corporation),
and JANE DOE,**

Defendants.

Civil Action No. 1:14-cv-1139

**Hon. Anthony J. Trenga
Hon. Magistrate Judge Ivan D. Davis**

**PLAINTIFF’S MOTION TO EXTEND TIME FOR OBJECTING TO
DEFENDANT’S INTERROGATORIES AND REQUESTS FOR PRODUCTION**

Plaintiff Charity Chidinma Emeronye Swift (“Mrs. Swift”), through her undersigned attorney, pursuant to Rule 26(C) of the Local Civil Rules, moves this Court for an extension of time until January 20, 2015 for making objections to Defendant Frontier Airlines, Inc.’s First Set of Interrogatories to Plaintiff and Defendant Frontier Airlines, Inc.’s First Set of Requests for Production of Documents and Other Things to Plaintiff, for reasons set forth in the memorandum submitted herewith. Mrs. Swift’ counsel has conferred with counsel for Frontier Airlines, Inc., but they have not consented to this motion.

Dated: January 20, 2014

Respectfully submitted,

/s/ Stephen Christopher Swift

Stephen Christopher Swift

Virginia State Bar ID No. 38419

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Charity Chidinma Emeronye Swift

CERTIFICATE OF SERVICE

I hereby certify that, on January 20, 2014, I electronically filed the foregoing document with the Clerk of the Court, using the Court's CM/ECF system, which will automatically cause all counsel of record to be served therewith.

/s/ Stephen Christopher Swift
Stephen Christopher Swift